

EXHIBIT A

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UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

This Document Relates to:

ALL ACTIONS

**DECLARATION OF VERONICA HAYES
GROMADA IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION TO COMPEL
PRODUCTION OF POLICY
DOCUMENTS AND INSPECTION AND
FOR SANCTIONS**

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

DECLARATION OF VERONICA HAYES GROMADA IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL

DECLARATION OF VERONICA HAYES GROMADA

I, Veronica Hayes Gromada, having personal knowledge of the following state:

1. I am an attorney at the law firm of Shook, Hardy & Bacon LLP, attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am a member in good standing of the Bars of the State of Texas and Washington, D.C. and am admitted *pro hac vice* in the above-referenced action. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so. I respectfully submit this declaration in support of Defendants’ Opposition to Plaintiffs’ Motion to Compel Production of Policy Documents and Inspection and for Sanctions.

2. On July 26, 2024, Defendants provided Plaintiffs with an index created by counsel that identified company policies for the following categories: Global Standards, Standards, Global Policies, Global Guidelines, and US & Canada Business Standards, pursuant to ECF No. 706. This index is attached as Exhibit 1. Defendants also provided Plaintiffs with the homepages of its operational guidelines, known as Knowledge Bases.

3. On January 10, 2025, Defendants produced all available versions of the 40 documents Plaintiffs identified pursuant to ECF No. 1996, with the exception of two legal process guidelines that were withheld and logged for privilege. This production consisted of 572 documents comprising almost 7,300 pages. Along with this production, Defendants also provided an attorney letter with a 21-page detailed timeline of the operative versions of each policy, as well as a decoder prepared by counsel to tie Plaintiffs' requests to the specific titles of the documents as stored by Defendants. The production letter, timeline, and decoder are collectively attached as Exhibit 2. The document Plaintiffs provide as Exhibit E is a document Defendants identified for production on January 31, 2025. Exhibit E is not one of the 40 documents requested by Plaintiffs.

4. On January 27, 2025, I sent a letter to Plaintiffs' counsel with a chart listing policies and the related operational guidelines (Knowledge Bases) produced through that date, collectively attached as Exhibit 3. This letter, pursuant to ECF No. 2138, "explain[ed] the criteria Uber used to

1 determine whether to produce documents hyperlinked from the policy-related documents Uber has
 2 produced.” The January 27 attorney letter also provided information about “how [Defendants’]
 3 relevant policies, as well as [their] guidelines and operating procedures implementing those policies,
 4 have been stored and organized during the relevant period in this MDL, and when they have been
 5 updated.” ECF No. 2138 at 1-2. This information was provided before the January 31 declaration
 6 deadline to aid in Plaintiffs’ understanding of the search methodology and the limitations related
 7 thereto.

8 5. By January 31, 2025, Defendants had produced over 7,800 documents, comprising
 9 almost 72,000 pages of policies, related operational guidelines, and other materials, including the
 10 572 documents based on the 40 documents requested by Plaintiffs on December 20 and 23, 2024.

11 6. On February 14, 2025, Plaintiffs’ counsel Bret Stanley sent an email claiming that
 12 Defendants had failed to produce any of the related operational guidelines from the requested
 13 policies. Mr. Stanley further indicated his belief that this issue was ripe for PTO 8 escalation.

14 7. In a conferral held on February 20, 2025, in response to Defendants’ requests, Mr.
 15 Stanley declined to identify any examples of links Plaintiffs believed were relevant and not
 16 produced.

17 8. Defendants’ counsel has repeatedly requested Plaintiffs to provide specific hyperlinks
 18 and offered to investigate them for production, but these offers were rebuffed. Plaintiffs’ counsel
 19 have taken the position that Defendants are required to collect “all of them.”

20 9. The hyperlink identified with the text “this document” in Exhibit F in Plaintiffs’
 21 Motion to Compel was produced with a privilege slipsheet placeholder at
 22 UBER_JCCP_MDL_000033408 on August 12, 2024. It was logged for privilege at
 23 JCCP_MDL_PRIVLOG014684 and has never been challenged.

24 I declare under penalty of perjury that the foregoing is true and correct.

25
 26 Executed on March 11, 2025.

By: 

27
 28 Veronica Hayes Gromada